

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

PAN AMERICAN GRAIN
MANUFACTURING CO., INC.
Plaintiff

v.

DAVID COHEN, in his official capacity as
REGIONAL DIRECTOR of NATIONAL
LABOR RELATIONS BOARD, REGION
12,
Defendant

CIVIL ACTION NO. 24-1274 (SCC)

PETITION FOR WRIT OF MANDAMUS

MOTION SUBMITTING CERTIFIED TRANSLATIONS

COMES NOW Petitioner Pan American Grain Manufacturing Co. Inc. (“Pan American Grain” or the “Petitioner”) and respectfully states and prays:

1. Pan American Grain recently filed a Petition for Writ of Mandamus. See Docket No. 1.
2. Exhibits 5-7 of the Petition includes certain sections in the Spanish language.
3. The Court granted an extension of time until July 29, 2024, to file certified translations. See Docket No. 10.
4. Pan American Grain is submitting certified translations of the relevant parts of Exhibits 5-7.

Wherefore, it is respectfully requested that the Court note that Pan American Grain submitted certified translations of Exhibits 5-7 of the Petition.

RESPECTFULLY SUBMITTED in San Juan, Puerto Rico, on this 29th of July 2024.

IT IS HEREBY CERTIFIED that on this same date the foregoing motion was filed by uploading it to the CM/ECF system, which will send automatic notices to the attorneys of record.

/ s / Agustín Collazo Mojica
Agustín Collazo Mojica
USDC No. 119012
9 Claudia St.
Suite 301
Amelia Industrial Park
Guaynabo, PR 00969
Tel. 787-753-8585
Fax 787-753-5278
acollazo@aclawoffice.com

Busó García LLC

/ s / Pedro A. Busó García
Pedro Busó García
USDC No. 222511
290 Avenida Jesús T. Piñero
San Juan, Puerto Rico 00918
(787) 474-2114
pbuso@pbglawpr.com

/ s / Rafael Cox Alomar
Rafael Cox Alomar
USDC No. 226413
The Chubb Plaza, Suite 803
33 Resolución Street
San Juan, Puerto Rico 00920
(787) 707-8621
rcoxalomar@coxalomarlaw.com